

UNITED STATES JRITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

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ANNUAL AUDITED REPORT FORM X-17A-5 PART 111

SEC FILE NUMBER **65977**

FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

New York (City) NAME AND TELEPHONE NUMBER OF PERSON	S: (Do not use P.	O. Box No.) IN REGARD TO	10022 (Zíp Code)	PROCES MAR 0 9
Short Hills Capital LLC ADDRESS OF PRINCIPAL PLACE OF BUSINESS 215 E. 51 st Street, Suite 9C (No. New York (City) NAME AND TELEPHONE NUMBER OF PERSON	N.Y. (State)	IN REGARD TO	FIRM I.D. NO. 10022 (Zip Code)	PROCE
ADDRESS OF PRINCIPAL PLACE OF BUSINESS 215 E. 51 st Street, Suite 9C (N. New York (City) NAME AND TELEPHONE NUMBER OF PERSON	N.Y. (State)	IN REGARD TO	10022 (Zip Code)	
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NAME AND TELEPHONE NUMBER OF PERSON	,		\vdash	THOMS
	N TO CONTACT		THIS REPORT	TUONS(
Kevin A. Pollack		(2.1	2) 758-7899	LINANCI
			ea Code - Telephone Nui	mber)
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NDEPENDENT PUBLIC ACCOUNTANT whose of the control o	al, state last, first, m	·		
2120 Powers Ferry Road, Suite 350	Atlanta	Georg	ia 30339.	1.
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*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

> Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

SEC 1410 (06-02)



OATH OR AFFIRMATION

I,	Kevin A. Pollack	, swear (or affirm) that, to the best of my	
knowled	lge and belief the accompanying fin	ancial statement and supporting schedules pertaining to the firm of	
	Short Hills Capital LLC	, as	
of	December 31	2006, are true and correct. I further swear (or affirm) that	
	he company nor any partner, propried d solely as that of a customer, except	tor, principal officer or director has any proprietary interest in any account as follows:	
Dna	Notary Public	Signature County tay 27, 2007 Do, 2007 Title	
This rep	oort ** contains (check all applica (a) Facing Page.	ble boxes):	
P	(b) Statement of Financial Cond	lition.	
	(c) Statement of Income (Loss)		
	(e) Statement of Changes in Stockholders' Equity or Partners" or Sole Proprietors" Capital.		
님	_	abilities Subordinated to Claims of Creditors.	
	(g) Computation of Net Capital (h) Computation for Determina	tion of Reserve Requirements Pursuant to Rule 15c3-3.	
H		Possession or Control Requirements Under Rule 15c3-3.	
Ö	(j) A Reconciliation, including	appropriate explanation of the Computation of Net Capital Under tation for Determination of the Reserve Requirements Under Exhibit	
	(k) A Reconciliation between the	ne audited and unaudited Statements of Financial Condition with	
_	respect to methods of conso	lidation.	
	(l) An Oath or Affirmation.		
	(m) A copy of the SIPC Suppler	•	
	(n) A report describing any mate date of the previous audit.	erial inadequacies found to exist or found to have existed since the	

^{**}For conditions of confidential treatment of certain portions of this filing, see section 240.17z-5(e)(3).

SHORT HILLS CAPITAL LLC Financial Statements and Schedules as of December 31, 2006 With Report of Independent Auditor CERTIFIED PUBLIC ACCOUNTANTS

2120 Powers Ferry Road Suite 350 Atlanta, GA 30339 Office: 770 690-8995

Fax: 770 980-1077

REPORT OF INDEPENDENT AUDITORS

To the Owner of Short Hills Capital LLC:

We have audited the accompanying statement of financial condition of Short Hills Capital LLC, as of December 31, 2006 and the related statements of operations, changes in member's equity, and cash flows for the year then ended that you are filing pursuant to Rule 17a-5 under the Securities and Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Short Hills Capital LLC as of December 31, 2006 and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in Schedules I, II and III is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17a-5 of the Securities and Exchange Commission. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

RUBIO CPA, PC

February 1, 2007 Atlanta, Georgia

SHORT HILLS CAPITAL LLC STATEMENT OF FINANCIAL CONDITION December 31, 2006

ASSETS

Cash and cash equivalents Other assets	\$	16,432 738
Total assets		<u> 17,170</u>
LIABILITIES AND STOCKHOLDER'S EQUI	ГΥ	
Liabilities:		
Accounts payable	\$	<u>500</u>
Total liabilities		500
Total haomues		<u> </u>
Member's Equity		16,670
Total liabilities and member's equity	<u>\$</u>	17,170

SHORT HILLS CAPITAL LLC STATEMENT OF OPERATIONS FOR THE YEAR ENDED DECEMBER 31, 2006

REVENUES:	
Investment Banking Fees	<u>\$ 17,447</u>
Total revenues	<u>17,447</u>
EXPENSES:	
Compensation to owner	4,000
Other operating expenses	9,158
Total expenses	<u>13,158</u>
NET INCOME	<u>\$ 4,289</u>

SHORT HILLS CAPITAL LLC STATEMENT OF CASH FLOWS FOR THE YEAR ENDED DECEMBER 31, 2006

CASH FLOWS FROM OPERATING ACTIVITIES: Net income	\$ 4,289
Adjustments to reconcile net income to net cash provided by operating activities:	
Decrease in accounts payable	 <u>(76</u>)
Net cash provided by operating activities	 4,213
NET INCREASE IN CASH	4,213
CASH, at beginning of year	 12,219
CASH, at end of year	\$ 16,432

SHORT HILLS CAPITAL LLC STATEMENTS OF CHANGES IN MEMBER'S EQUITY FOR THE YEAR ENDED DECEMBER 31, 2006

Balance,	
December 31, 2005	\$ 12,381
Net income	4,289
Balance, December 31, 2006	\$ <u>16,670</u>

SHORT HILLS CAPITAL LLC NOTES TO FINANCIAL STATEMENTS AND SCHEDULES December 31, 2006

CORPORATE ORGANIZATION AND BUSINESS

The Company was formed in April 2003.

The Company is subject to the regulations of the National Association of Securities Dealers, Inc., the Securities and Exchange Commission, and the Securities Division of the state of New York.

The Company's primary business is to provide investment banking services.

SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Estimates: The preparation of financial statements requires the use of certain estimates by management in determining the entity's assets, liabilities, revenues and expenses.

INCOME TAXES

The Company is organized as a Limited Liability Company, taxable as a sole proprietorship. Therefore, all income, losses, and tax credits flow through and are taxed in the income tax returns of its owner.

CASH AND CASH EQUIVALENTS

The Company considers all cash and money market instruments with a maturity of 90 days or less to be cash and cash equivalents.

NET CAPITAL REQUIREMENTS

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At December 31, 2006, the Company had net capital of \$15,932 which was \$10,932 in excess of its required net capital of \$5,000.

RELATED PARTY TRANSACTIONS

The Company operates from office space provided by its owner at no cost. The fair value of office space is considered insignificant.

Financial position and results of operations would differ from the amounts in the accompanying financial statements if these related party transactions did not exist.

SHORT HILLS CAPITAL LLC

SCHEDULE I COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION ACT OF 1934

December 31, 2006

COMPUTATION OF NET CAPITAL: Total member's equity Less nonallowable assets	\$ 16,670 (738)
Net capital	\$ 15,932
COMPUTATION OF AGGREGATE INDEBTEDNESS: Aggregate indebtedness	\$ 500
COMPUTATION OF BASIC NET CAPITAL REQUIREMENT: Minimum net capital required	\$ 5,000
EXCESS NET CAPITAL	\$ 10,932
PERCENTAGE OF AGGREGATE INDEBTEDNESS TO NET CAPITAL	3.1%

SHORT HILLS CAPITAL LLC

SCHEDULE II

COMPUTATION FOR DETERMINATION OF THE RESERVE REQUIREMENTS
UNDER THE SECURITIES AND EXCHANGE COMMISSION RULE 15c3-3
AND INFORMATION RELATING TO THE POSSESSION OR CONTROL
REQUIREMENTS UNDER SECURITIES AND EXCHANGE COMMISSION RULE 15c3-3
DECEMBER 31, 2006

The Company is not required to file the above schedules as it is exempt from Securities and Exchange Commission Rule 15c3-3 under paragraph (k)(2)(i) of the rule and does not hold customers' funds or securities.

SCHEDULE III

RECONCILIATION PURSUANT TO SECURITIES AND EXCHANGE COMMISSION RULE 17a-5(d)4 DECEMBER 31, 2006

There are no significant differences between the computation of net capital included in these financial statements and the net capital computation included in the Company's December 31, 2006 unaudited Focus Report filing. Therefore, no reconciliation is necessary.

CERTIFIED PUBLIC ACCOUNTANTS

2120 Powers Ferry Road Suite 350 Atlanta, GA 30339 Office: 770 690-8995

Fax: 770 980-1077

INDEPENDENT AUDITOR'S REPORT ON INTERNAL ACCOUNTING CONTROL REQUIRED BY RULE 17a-5

To the Board of Directors of Short Hills Capital LLC:

In planning and performing our audit of the financial statements of Short Hills Capital LLC for the year ended December 31, 2006, we considered its internal control structure, in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control structure.

Also, as required by Rule 17a-5(g)(1) of the Securities and Exchange Commission, we have made a study of the practices and procedures (including test of compliance with such practices and procedures) followed by Short Hills Capital LLC that we considered relevant to the objective stated in Rule 17a-5(g). We also made a study of the practices and procedures followed by the Company in making the periodic computations of aggregate indebtedness and net capital under Rule 17a-3(a)(11) and the procedure for determining compliance with the exemptive provisions of Rule 15c3-3. Because the Company does not carry security accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company related to the following: (1) in making the quarterly securities examinations, counts, verifications and comparisons, and the recordation of differences required by Rule 17a-13; (2) in complying with the requirements for prompt payment for securities under Section 8 of Regulation T of the Board of Governors of the Federal Reserve System; and (3) in obtaining and maintaining physical possession or control of all fully paid and excess margin securities of customers as required by Rule 15c3-3.

The management of the Company is responsible for establishing and maintaining an internal control structure and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control structure policies and procedures and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the Commission's above-mentioned objectives. Two of the objectives of an internal control structure and the practices and procedures are to provide management with reasonable, but not absolute, assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in any internal control structure or the practices and procedures referred to above, errors or irregularities may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

Our consideration of the internal control structure would not necessarily disclose all matters in the internal control structure that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of the specific internal control structure elements does not reduce to a relatively low level the risk that errors or irregularities in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, we noted no matters involving the internal control structure, that we consider to be material weaknesses as defined above.

However, we noted that due to the size of the Company, duties surrounding cash receipts and disbursements have not been segregated to achieve adequate internal control over these functions. These conditions were considered in determining the nature, timing and extent of procedures performed in our audit of the financial statements for the year ended December 31, 2006 and this report does not effect our report thereon dated February 1, 2007.

In addition, no facts came to our attention indicating that the exemptive provision of Rule 15c3-3 had not been complied with during the year.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the Commission to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures were adequate at December 31, 2006 to meet the Commission's objectives.

This report is intended solely for the use of management, the Securities and Exchange Commission, the New York Stock Exchange and other regulatory agencies which rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 and should not be used for any other purpose.

February 1, 2007 Atlanta, Georgia

RUBIO CPA, PC

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